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International Alliance of Theatrical Stage Employees
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NEVADA RESORT ASSOCIATION –
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES
AND MOVING PICTURE MACHINE
OPERATORS OF THE UNITED STATES
AND CANADA LOCAL 720 PENSION
TRUST,

Plaintiff,

vs.

JB VIVA VEGAS, L.P.,

Defendant.

JB VIVA VEGAS, L.P.,

Counterclaimant,

vs.

CASE NO.: 2:19-cv-00499-JAD-DJA

**STIPULATION AND ORDER TO EXTEND
DEADLINE TO FILE MOTIONS FOR
SUMMARY JUDGMENT**

[FIRST REQUEST]

NEVADA RESORT ASSOCIATION –
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES
AND MOVING PICTURE MACHINE
OPERATORS OF THE UNITED STATES
AND CANADA LOCAL 720 PENSION
TRUST,

Counterdefendant.

Plaintiff Nevada Resort Association-International Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of the United States and Canada Local 720 Pension Trust (the “Trust”) and Defendant JB Viva Vegas, L.P. (“JB”) (collectively “the Parties”) hereby stipulate and request an order extending the deadline from August 26, 2019, to September 10, 2019, to file the parties’ respective motions for summary judgment.

On July 8, 2019, the Parties jointly submitted a proposed scheduling order requesting a special scheduling review. (ECF No. 15.) In their proposed order, the Parties reported that they agreed only dispositive motion briefing was required in this case because this matter is a judicial review of an arbitration award related to a withdrawal liability dispute pursuant to Multiemployer Pension Plan Amendments Act of 1980, and specifically 29 U.S.C. § 1401(b)(2). (*Id.*)

On July 11, 2019, this Court granted the Parties’ proposed scheduling order and scheduled dispositive motions to be filed by August 26, 2019, with oppositions to be filed by September 16, 2019, and replies to be filed by September 30, 2019. (ECF No. 16.)

In the interim, the Trust’s counsel has encountered numerous unexpected professional obligations that require nearly immediate response. As a result, Trust’s counsel requested an agreement from JB’s counsel to extend the deadline to file motions for summary judgment until September 10, 2019. JB’s counsel graciously agreed to the extension in the spirit of professional courtesy.

The parties therefore jointly request that the Court approve the following amended briefing schedule:

1. The Parties shall have until Tuesday, September 10, 2019, to file dispositive motions.

2. The Parties shall have until Tuesday, October 1, 2019, to file oppositions to dispositive motions.

3. The Parties shall have until Tuesday, October 15, 2019, to file replies in support of dispositive motions.

This request is not being brought for the purpose of delay, but to enable the Parties enough time to properly brief the numerous issues in this matter for this Court.

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Attorneys for Plaintiffs

Attorneys for Defendant

Dated: August 15, 2019.

Dated: August 15, 2019.

ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: August 19, 2019

CASE NO. 2:19-cv-00499-JAD-DJA